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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DENNIS SHERIDAN and KATHLEEN A.)	
SHERIDAN, his wife,)	CIVIL ACTION NO.:
)	
Plaintiffs,)	
)	
vs.)	Civil Action
)	
MATTHEW T. McLAUGHLIN and)	COMPLAINT AND
TAYLORS GARAGE, INC.)	DEMAND FOR JURY TRIAL
)	
Defendants.)	
)	
)	

JURISDICTION AND VENUE

1. Plaintiffs, Dennis Sheridan and Kathleen Sheridan, his wife, are residents of the State of New Jersey having resided and continuing to reside at 12 Arthur Avenue, Belleville, New Jersey.
2. Defendant, Matthew McLaughlin, is a resident of the State of Delaware having resided and continuing to reside at 10 Advent Court, Newark, Delaware.
3. Defendant, Taylors Garage, Inc., is incorporated and/or maintains its principal place of business in the State of Pennsylvania at 1350 Broadway Road, Milton, Pennsylvania.

4. The location of the accident between the parties was at a multi-leg intersection of East Main Street and Main Street (Route 0042) in Columbia in the municipality of Catawissa Borough of Pennsylvania.

5. Upon information and belief, the amount of controversy exceeds \$75,000.00.

6. Accordingly, this Court has diversity jurisdiction of this action pursuant to 28 U.S.C. § 1332.

FIRST COUNT

1. On or about Saturday, August 7, 2021, at approximately 4:03 p.m., Plaintiff, Dennis Sheridan was traveling directly in front of Defendant, Matthew McLaughlin, who was driving a commercial dump truck owned by Taylors Garage, Inc. in the multi-leg intersection of East Main Street and Main Street (Route 0042) in Columbia in the municipality of Catawissa Borough in the State of Pennsylvania.

2. On the aforesaid date and time, Defendant, Matthew McLaughlin, was the operator of a vehicle, owned by Taylors Garage, Inc., that was traveling directly behind Plaintiff, Dennis Sheridan's vehicle.

3. At the aforesaid time and place, Defendant, Matthew McLaughlin, negligently, carelessly and recklessly operated the aforesaid motor vehicle by failing to make proper observations, take evasive actions, and otherwise failed to maintain proper following distance, causing him to violently strike the rear of Plaintiff, Dennis Sheridan's vehicle, seriously injuring the Plaintiff.

4. As a direct and proximate result of the negligence of Defendant, Matthew McLaughlin, Plaintiff, Dennis Sheridan, sustained permanent and serious injuries including, but not limited to: *disc herniations at C2-3, C3-4 and C4-5 in the cervical spine; an annular fissure impinging upon the thecal sac at C4-5; disc herniations at L2-3 and L3-4 with impingement upon the anterior thecal sac at L3-4 in the lumbar spine; a longitudinal tear within the distal subscapularis tendon, a linear tear of the supraspinatus tendon, and a glenoid labral tear of the left shoulder; a large lateral tear of the anterior horn of the lateral meniscus of the right knee; and a tear of the ACL with medial and lateral meniscal tears of the left knee;* has been and will be caused great pain and suffering, has been and will be caused to expend large sums of money in an effort to cure himself of his injuries; has been and will be deprived of attending to his usual activities and other great damages.

WHEREFORE, Plaintiffs, Dennis Sheridan and Kathleen Sheridan, his wife, demand judgment against Defendants, Matthew McLaughlin and Taylors Garage, Inc., jointly and severally, for attorneys' fees and costs of suit and whatever other damages this Court deems just and equitable.

SECOND COUNT

1. Plaintiffs, Dennis Sheridan and Kathleen Sheridan, his wife, repeat each and every allegation of the First Count of the Complaint as though fully set forth herein.

2. At all relevant times herein, Plaintiff, Kathleen Sheridan, was the lawful wife of the Plaintiff, Dennis Sheridan.

3. As a direct and proximate result of the negligence of the Defendants, Matthew McLaughlin and Taylors Garage, Inc., as aforesaid, the Plaintiff, Kathleen Sheridan, has been and

will be deprived of the services, consortium and companionship of the Plaintiff, Dennis Sheridan.

WHEREFORE, Plaintiffs, Dennis Sheridan and Kathleen Sheridan, his wife, demand judgment against Defendants, Matthew McLaughlin and Taylors Garage, Inc., jointly and severally, for attorneys' fees and costs of suit and whatever other damages this Court deems just and equitable.

EINHORN, BARBARITO,
FROST & BOTWINICK, P.C.
Attorneys for Plaintiffs

BY:


CHRISTOPHER L. MUSMANNO

Dated: March 22, 2022

LOCAL RULE 11.2 CERTIFICATION

Plaintiffs certify that this matter in controversy is not the subject of any other action pending in any other Court, or of any pending arbitration or administrative proceeding.

EINHORN, BARBARITO,
FROST & BOTWINICK, P.C.
Attorneys for Plaintiffs

BY:


CHRISTOPHER L. MUSMANNO

Dated: March 22, 2022

JURY DEMAND

Plaintiffs hereby request a trial by jury on all triable issues.

EINHORN, BARBARITO,
FROST & BOTWINICK, P.C.
Attorneys for Plaintiffs

BY: 

CHRISTOPHER L. MUSMANNO

Dated: March 22, 2022